## REMARKS

The examiner is thanked for the performance of a thorough search. By this amendment, Claims 1-3, 5, 6, 12-14, 16, 17, 22-24, 32-34, 36, 37, and 42 have been amended. Claims 4, 15, 25, and 35 have been cancelled. Hence, Claims 1-3, 5-14, 16-24, 26-34, 36-42 are pending in the application. The amendments to the claims as indicated herein do not add any new matter to this application. Furthermore, except as indicated herein, amendments made to Claims 1-3, 5, 6, 12-14, 16, 17, 22-24, 32-34, 36, 37, and 42 have been made to exclusively improve readability and clarity of the claims and not for the purpose of overcoming alleged prior art.

Each issue raised in the Office Action mailed April 8, 2004 is addressed hereinafter.

I.      ISSUES RELATING TO PRIOR ART: Goiffon

The Office Action rejected Claims 1-3, 5-14, 16-24, 26-34, and 36-42 under 35 U.S.C. § 102(e) as allegedly unpatentable over US Patent No. 6,453,312 granted to Goiffon et al. ("Goiffon"). The rejection is respectfully traversed.

Independent Claims 1, 12, 22, 32, and 42 have been amended to include the limitations of originally-filed Claims 4, 15, 25, 35, and 4, respectively. Since the Office Action has stated that Claims 4, 15, 25, and 35 are allowable over Goiffon, it follows that Claims 1, 12, 22, 32, and 42, as amended, are allowable.

Furthermore, Claims 2-3, 5-11, 13- 14, 16-21, 23-24, 26-31, 33-34, and 36-41 were rejected in the Office Action and each depends directly or indirectly from Claims 1, 12, 22, or 32 and further limits that claim. Claims 2-3, 5-11, 13- 14, 16-21, 23-24, 26-31, 33-34, and 36-41 also incorporate each and every feature of the independent claim from which they depend. Since independent Claims 1, 12, 22, or 32 are allowable, as discussed above, Claims 2-3, 5-11, 13- 14, 16-21, 23-24, 26-31, 33-34, and 36-41 are also allowable.

II.     ISSUES RELATING TO PRIOR ART: POVILUS

The Office Action rejected Claims 1-42 under 35 U.S.C. § 102(b) as being allegedly

anticipated by U.S. Patent 5,740,425 issued to *Povilus* and referred to herein as *Povilus*. The

rejection is respectfully traversed.

Anticipation under 35 U.S.C. § 102 requires a reference to teach or disclose each and

every element, limitation, or step of a claim. Since Claims 1-42 each include at least one element

not found in *Povilus*, the *Povilus* patent does not anticipate Claims 1-42 under 35 U.S.C. § 102.

1.      CLAIMS 1, 12, 22

Although Claims 1, 12, and 22 are not the same, because the Office Action has applied

the same reasoning for each of Claims 1, 12, and 22, the following remarks will consider these

claims together.

The Office Action alleges that *Povilus* teaches the amended features:

storing a plurality of names for a single entity associated with the enterprise as a first
        plurality of corresponding concepts in a database of concepts and relationships
        among concepts (FIGs. 10-14) , which database describes a plurality of entities
        associated with the enterprise, wherein each name of the plurality of names is
        associated with a particular concept of the first plurality of corresponding
        concepts;  (Col 3, lines 10-25)
designating a first concept of the first plurality of corresponding concepts as a normative
        concept; (Col 7, lines 10-25)
receiving a request including data indicating a particular name of the plurality of names,
        wherein the request does not include data indicating a first name corresponding to
        the first concept; and (Col 8, lines 10-20)
in response to receiving the request, sending a response including content of a file
        associated in the database with the first concept.  (Col 8, lines 10-65)

This is incorrect.  Each of Claims 1, 12, and 22 has one or more features that are lacking

in the prior art of record.  For example, *Povilus* does not teach the feature of "in response to

receiving the request, sending a response including content of a file associated in the database

with the first concept," wherein the request includes "data indicating a particular name of the

plurality of names, wherein the request does not include data indicating a first name corresponding to the first concept."

In the cited section, Col 8, lines 10-65, and elsewhere in *Povilus*, *Povilus* teaches a system finding product realms (product categories) based on a search term entered by a user. The user then selects one of the product realms in order to "display a path node associated with the Definer." (Col 9, lines 12-13) *Povilus* teaches that each Definer is associated with a 'product realm': "The second step is to create sufficient Definers and synonyms to describe the known characteristics of products in the particular general field of knowledge that encompasses the [product] realms to be addressed and/or to verify their pre-existence." A product realm is a set of products related by characteristic (such as ultrasonic level sensors): "The process begins by analyzing the product realm to determine what distinguishing characteristics the products that fall within the realm may have." (Col 31, lines 30-33) Restated, *Povilus* teaches: allowing a user to enter a search term, the user receiving a list of product realms that contain that search term, and the user selecting one of the product realms to see a navigation path to the product realm (see, e.g. FIG. 7). *Povilus* teaches sending, based on the user selection, a response containing navigation path information for the product realm.

*Povilus*, however, does not teach sending, in response to a request, a response including *content of a file* (e.g., an image stored in a file) associated with a first (normative) concept. As *Povilus* does not teach, among other things, the feature of "in response to receiving the request, sending a response including content of a file associated in the database with the first concept," *Povilus* could not possibly teach Claims 1, 12, or 22. For these reasons, the rejection is respectfully traversed.

2.      CLAIM 32

The Office Action alleges that *Povilus* teaches Claim 32, as follows:

> a database of concepts and relationships among concepts describing a plurality of entities associated with the enterprise; and (Col 3, lines 3-30)
> a processor configured to perform the steps of storing a plurality of names for a single entity associated with the enterprise as a first plurality of corresponding concepts in the database, wherein each name of the plurality of names is associated with a particular concept of the first plurality of corresponding concepts; (FIG. 10 – FIG. 14)
> indicating a first concept of the first plurality of corresponding concepts as a normative concept; (Col 7, lines 10-25)
> receiving a request including data indicating a particular name of the plurality of names, wherein the request does not include data indicating a first name corresponding to the first concept; and  (Col 8, lines 10-20)
> in response to receiving the request, sending a response including content of a file associated in the database with the first concept. (Col 8, lines 10-65)

This is incorrect.  One or more features of Claim 32 are lacking in the prior art of record. For example, as described in the remarks above with respect to Claims 1, 12, and 22, *Povilus* does not teach the feature of "in response to receiving the request, sending a response including content of a file associated in the database with the first concept".  As *Povilus* does not teach, among other things, the feature of "in response to receiving the request, sending a response including content of a file associated in the database with the first concept," *Povilus* could not possibly teach Claim 32.  Therefore, the rejection is respectfully traversed.

3.      CLAIM 2-11, 13-21, 23-31, and 33-41

Claims 2-11, 13-21, 23-31, and 33-41 were rejected in the Office Action and each depends directly or indirectly from Claims 1, 12, 22, or 32 and further limits that claim.  The dependent claims also incorporate each and every feature of the independent claim from which they depend. Since independent Claims 1, 12, 22, or 32 are allowable, as discussed above, Claims 2-11, 13-21, 23-31, and 33-41 are also allowable.  In addition, each of the dependent

Claims 2-11, 13-21, 23-31, and 33-41 independently introduces one or more features that render it independently patentable over the prior art of record.

Consider Claims 11, 21, 31, and 41. Each of these claims is different. However, since the Office Action treats them together, they are discussed together here. Regarding Claims 11, 21, 31, and 41, the Office Action alleges that *Povilus* teaches:

> wherein the entities include the set of activities of the enterprise; and wherein the set of activities of the enterprise include at least one of administration, research, marketing, joint ventures and documentation (Col 10, lines 25-40).

The cited section of *Povilus* reads:

> The display would also imply that there may be ultrasonic (node 118) level sensors that sense the level of a solid (node 114), and that sense only a single level (node 128) of liquid (node 112) in a tank.
> Once the computer has displayed a navigational path through the concept structure identifying products with the desired combination of characteristics, the lead engineer may instruct the computer to list the available products that have these characteristics. In reviewing the available product listing, the lead engineer would be able to recognize the name of a manufacturer, X, as the manufacturer associated with the pamphlet. The lead engineer may then cause the computer to display the product description content associated with the product manufactured by Manufacturer X. If, upon reviewing the detailed product characteristics, the lead engineer discovers that this product would require an above tank mounting clearance that is not possible given the positioning of the tank in the facility, which allows only 1/2 inch, the lead engineer may search for similar products having a desired maximum for clearance requirement.

Column 10, lines 25-40 of *Povilus* describes an end user refining a product realm search. The cited section of *Povilus* does not, however, teach "the entities include[ing] the set of activities of the enterprise; and wherein the set of activities of the enterprise include at least one of administration, research, marketing, joint ventures and documentation" as featured in Claims 11, 21, 31, and 41. In fact, no part of *Povilus*, including the cited section, even uses the words administration, research, marketing, joint ventures, or documentation. Therefore, *Povilus* could not possibly teach "wherein the entities include the set of activities of the enterprise; and wherein

14

the set of activities of the enterprise include at least one of administration, research, marketing, joint ventures and documentation." Therefore, *Povilus* could not possibly teach Claims 11, 21, 31, and 41.

4.    CLAIM 42

Regarding Claim 42, the Office Action alleges that *Povilus* teaches:

> A method of responding to a request for data about an enterprise using a data store that comprises a stored plurality of names for a single entity associated with the enterprise, (Col 7, lines 10-30) a first plurality of corresponding concepts in a database of concepts and relationships among concepts, (Col 6, lines 10-50) which database describes a plurality of entities associated with the enterprise, and wherein a first concept of the first plurality of corresponding concepts is identified as a normative concept (Col 7, lines 10-30), the method comprising the computer-implemented steps of:
> receiving a request including data indicating a particular name of the plurality of names,
>     wherein the request does not include data indicating a first name corresponding to the first concept; and  (Col 8, lines 5-20)
> in response to receiving the request, sending a response including content from a file
>     associated in the database with the first concept. (Col 8, lines 15-45)

This is incorrect. One or more features of Claim 42 are lacking in the prior art of record. For example, as described above with respect to Claims 1, 12, 22, and 32, *Povilus* does not teach the feature of "in response to receiving the request, sending a response including content from a file associated in the database with the first concept." As *Povilus* does not teach, among other things, the feature of "in response to receiving the request, sending a response including content from a file associated in the database with the first concept," *Povilus* could not possibly teach Claim 42. For these reasons, the rejection is respectfully traversed.

III.    CONCLUSIONS & MISCELLANEOUS

For the reasons set forth above, it is respectfully submitted that all of the pending claims, as originally filed or as currently amended, are now in condition for allowance. Therefore, the

issuance of a formal Notice of Allowance is believed next in order, and that action is earnestly solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

A petition for extension of time, to the extent necessary to make this reply timely filed, is hereby made. If applicable, a check for the petition for extension of time fee is enclosed herewith. If any applicable fee is missing or insufficient, throughout the pendency of this application, the Commissioner is hereby authorized to any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,

HICKMAN PALERMO TRUONG & BECKER LLP

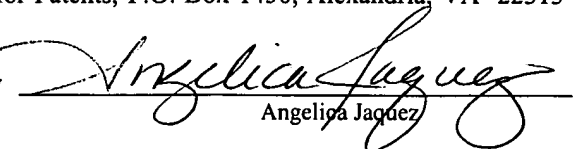Dated: __August 4, 2004__

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**CERTIFICATE OF MAILING**

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

On __August 4, 2004__ By _____

Angelica Jaquez

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